



Ms. Marlene H. Dortch, Secretary Federal Communications Commission 9300 East Hampton Drive Capitol Heights, MD 20743

RE: Velocity.Net Communications, Inc.

Velocity Network, Inc.

EB Docket No. 06-36; CY2014

EB Bocket No. 00-30, C 120

499 Filer ID: 826891 499 Filer ID: 829706

Dear Ms. Dortch:

Enclosed for filing please find

Attached for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Velocity.Net Communications, Inc. and its affiliate, Velocity Network, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Carey Roesel

Carey Roesel
Consultant to Velocity.Net Communications, Inc. and
Velocity Network, Inc

cc:

Joel Deuterman - Velocity

file:

Velocity - FCC CPNI

tms:

FCCx1501

Enclosures CR/gs

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE EB Docket 06-36

Annual 64,2009(e) CPNI Certification for 2015:

Calendar Year 2014

Name of Companies covered by this certification:

Velocity.Net Communications, Inc. Velocity Network, Inc.

Form 499 Filer ID: 826891 Form 499 Filer ID: 829706

Name of Signatory:

Joel Deuterman

Title of Signatory:

President

I, Joel Deuterman, certify and state that:

- I am the President of Velocity. Net Communications, Inc. and Velocity Network, Inc. (collectively known as "the Velocity Companies") and, acting as an agent of the Velocity Companies, that I have personal knowledge that the Velocity Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.
- Attached to this certification, as Exhibit A, is an accompanying statement explaining
 how the Velocity Companies' procedures ensure that the Velocity Companies are in
 compliance with the requirements (including those mandating the adoption of CPNI
 procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001
 et seq. of the Commission's rules.
- The Velocity Companies <u>have not</u> taken any actions (i.e., proceedings instituted or petitions filed by the Velocity Companies at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
- The Velocity Companies <u>have not</u> received any customer complaints in the past year concerning the unauthorized release of CPNI.
- 5. The Velocity Companies represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Velocity Companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Joel Deuterman, President

February 13, 2015

Date

Attachments:

Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance

The Velocity Companies adhere to all CPNI rules as stated in $\S\S64.2001 - 64.2011$ concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can
 be clearly established prior to the use of CPNI; the establishment of a password system
 allowing only authorized entities to request and receive CPNI for their respective
 accounts;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of the companies' telecommunications policies and procedures to ensure compliance with the federal CPNI rules;
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.